

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

K.C., *et al.*,

Plaintiffs,

v.

No. 1:23-cv-00595-JPH-KMB

THE INDIVIDUAL MEMBERS OF THE  
MEDICAL LICENSING BOARD OF  
INDIANA, in their official capacities, *et al.*,

Defendants.

**Declaration of Krisztina Inskeep (GEKCO)**

Comes now Krisztina Inskeep, and states that:

1. I am an adult resident of Indiana.
2. I am the co-founder and host of Gender Expansive Kids & Co., otherwise known as GEKCO.
3. GEKCO is an Indianapolis-based unincorporated association, created in 2015, and is a peer-led monthly support group for families of transgender and gender expansive children.
4. Among other things, GEKCO organizes and hosts monthly meetings for the families of transgender and gender expansive youth. These meetings are designed to connect families with one another, provide peer support, discuss the issues these families

face, and provide resources that may help families navigate the complex issues that are common to transgender youth, such as education and healthcare.

5. ~~Parents~~ GEKCO is a vital resource in the community of transgender youth and their families, and we focus on serving Indiana families with children ages 13 and under who do not have many, if any, similar peer-support resources in their communities.

6. Due to threats to and persecution generally faced by transgender and gender expansive youth and their families, we carefully screen those who are invited to attend our meetings. Only transgender and gender expansive youth and their affirming families are invited to attend. At the current time, we have vetted, share resources with, and invite to meetings approximately two hundred individuals. Our group continues to grow, and attendance at our meetings has recently spiked in response to the numerous bills introduced in 2023 in the Indiana General Assembly that would adversely impact these families.

7. Our meetings are closed, due to confidentiality and safety concerns. At any given meeting, we usually have more than thirty people in attendance, including transgender and gender expansive youth and their family members.

8. Parents are particularly focused on finding appropriate, gender-affirming medical care for their children and seek recommendations from one another for medical providers who can educate them about the medical options available for their children. Families in our group with children approaching puberty uniformly seek information

and medical advice regarding use of puberty blockers and gender-affirming hormones. Based on the discussion at our meetings, these families appear to have opted for these treatments for their children when physicians advise they are medically appropriate.

9. Finding recommended and trusted medical providers is a major, ongoing challenge for families with transgender and gender expansive children. It has become much more difficult as families try to obtain medical treatment for their children outside Indiana's borders.

10. Since the introduction of S.E.A. 480, families have increasingly expressed concern and distress over whether they will need to relocate out of state in order to provide gender-affirming medical care to their children. Other families have expressed concern about the burden, cost, and medical insurance coverage issues of having to seek medical care for their children outside of Indiana's borders. As some of our families have sought care out of state at the few available medical facilities with this specialty, they have reported long wait times for appointments because of the number of states that have made such care illegal. At least one major out-of-state clinic has reportedly stated to an Indiana family that it is refusing to accept any out-of-state patients until their legal counsel can analyze the provisions of these many state laws to determine what treatment, if any, they can legally provide to patients from those states.

11. It is difficult to describe fully the depth of harm that S.E.A. 480 will cause our families and their children. They have reported increased bullying of their children as a

consequence of this and similar bills, and deep distress over their ability to obtain the life-saving medical treatment that their children require. Many of these children have already been living as their affirmed gender for years as they approach puberty, and will urgently require access to puberty blockers and gender-affirming hormones. That this care is not available in Indiana will not just burden their families; it will cause these children extreme pain, anxiety, depression, and potentially suicidality. It is a threat to their very personhood. For parents, it has caused a sense of powerlessness and acute distress over the significant damage to the health and welfare of their families.

**Verification**

I verify under penalty of perjury that the foregoing is true and correct.

Executed on: April 20, 2023  
DATE

Krisztina Inskeep  
Krisztina Inskeep, GEKCO

Prepared by:

Stevie J. Pactor  
ACLU of Indiana